

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION TO PERMIT
EVIDENCE UNDER FRE 412**

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

No. 25-cv-4276-PHX-CRB

Judge: Honorable Charles R. Breyer
Ctrm.: 501

1 I, Maya R. Kalonia, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the
3 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to
4 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to
5 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit
6 this declaration in support of Plaintiff's Administrative Motion to File Under Seal Plaintiff's Opposition to
7 Defendants' Motion to Permit Evidence Under FRE 412.

8 2. I have reviewed Plaintiff's Opposition and attached Exhibits A and B.

9 3. Plaintiff's Opposition is replete with intimate and sensitive aspects of Plaintiff's and third
10 parties' personal lives, Plaintiff's medical and mental health history, and the names of third parties.

11 4. Exhibit A includes intimate and sensitive aspects of Plaintiff's and third parties' personal
12 lives and Plaintiff's medical and mental health history.

13 5. Exhibit B includes Plaintiff's medical and mental health history and the names of third
14 parties.

15 6. Disclosure of the identified information in Plaintiff's Opposition and Exhibits A and B
16 would cause significant privacy harms resulting in public humiliation, reputational damage, unwanted
17 media attention, annoyance, and embarrassment.

18 7. The significant privacy concerns of Plaintiff and third parties outweigh the public's minimal
19 interest in knowing their identities or personal information. The public's interest in the case may be
20 satisfied without revealing this information.

21 8. There is no less restrictive alternative to sealing portions of Plaintiff's Opposition and
22 Exhibits that would protect the legitimate privacy interests of Plaintiff and third parties, since the
23 documents are replete with information that can and should be sealed.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on January 5, 2026 in Oakland, California.

26
27 /s/ Maya R. Kalonia

28 Maya R. Kalonia